

the transition or at the end of the transition when the constraints imposed by neighboring NTSC stations disappear.^{99/} Clearly, they need the flexibility to do so.

Public Television supports the Broadcasters' recommendation that proposals for new DTV channels or DTV station modifications be assessed based on engineering interference criteria rather than a geographic spacing table.^{100/} Appropriate engineering criteria would provide a much more flexible, precise and supple mechanism for analyzing the impact of new stations or station modifications on other facilities than the geographic spacing approach currently used in the television service. The latter approach fails to take into account the effect on signal propagation of terrain features and ignores engineering techniques that can be employed to reduce or eliminate interference. Thus, a geographic spacing approach may preclude the construction or modification of new facilities based on the distance between existing and proposed facilities even when the new facilities could be operated with no adverse affect on existing facilities.

Public Television also supports the use of industry frequency coordinators to evaluate changes to the DTV table of allotments -- both new channels and station modifications. Public Television agrees that such coordinators could be effectively employed to evaluate proposals for new facilities and station modifications quickly and resolve disputes among broadcasters, thereby conserving the Commission's time and resources. As suggested by the Broadcasters, the scope of the frequency coordinators' authority should encompass all NTSC

^{99/} See Section II.A. supra.

^{100/} See Broadcasters Comments, Section V.A.

and DTV modification requests, including those relating to channel changes, new DTV channel assignments, transmitter site relocations and other facility changes.^{101/}

^{101/} See Broadcaster Comments, Section V.B. As proposed by the Broadcasters, the frequency coordinating committees should take into account, in processing modification proposals, considerations of spectrum efficiency, preservation of NTSC service, expansion of DTV service, and interference to neighboring stations. See id.

CONCLUSION

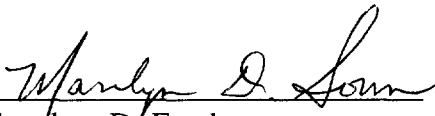
For the foregoing reasons, the Association of America's Public Television Stations and the Public Broadcasting Service urge the Commission to adopt expeditiously a table of digital allotments that will optimize coverage of DTV stations and minimize the disruption of noncommercial service during the transition to digital television.

Respectfully submitted,

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Certificate of Service

I, Shirley F. Oliver, hereby certify that on this 22nd day of November, 1996, I served a true copy of the foregoing Comments of the Association of America's Public Television Stations and the Public Broadcasting Service by hand delivery to:

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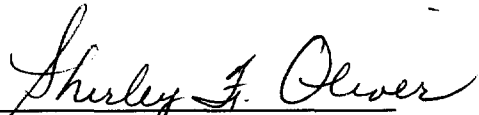

Shirley F. Oliver
Shirley F. Oliver

EXHIBIT 1

Corrections to FCC Database-NTSC Parameters for Public Television Stations
November 22, 1996

Call	City-State	NTSC	ERP-kW	HAAT(m)	RCAMSL(m)	Latitude	Longitude	Directional Antenna Make and Model	Reference Angle
WIIQ	DEMOPOLIS AL	41						Die TFU25JDA/PNT	
KETG	ARKADELPHIA AR	9		339	411	33-54-26	93-06-46		
KAFT	FAYETTEVILLE AR	13		347	1051	35-48-53	94-01-41		
KTEJ	JONESBORO AR	19		295	411				
KEMV	MOUNTAIN VIEW AR	6		303	767				
KVIE	SACRAMENTO CA	6	550						
KCSM	SAN MATEO CA	60	3550	362	423	37.41.07	122.26.01	Alan Dick UTA-25 H/V BP	
KTSC	PUEBLO CO	8	316	375	1889	38-22-25	104-33-27	JAM JZZ-2-0-A/8	
WCEU	NEW SMYRNA BEACH FL	15	708	176	185	29-10-24	81-09-24	Bogner B24UH	
WMFE	ORLANDO FL	24	1350					Jam JZT-4-0B	
WEIU	CHARLESTON IL	51	48.5	71.32	276.45				
WQPT	MOLINE IL	24	1200	276	497	41-19-17	90-22-47	DIE TMP32-G	
WSEC	JACKSONVILLE IL	14		103.17					
WMEC	MACOMB IL	22				40-23-54.2	90-43-55		
WUSI	OLNEY IL	16	977	298.4	441.66			RCA TFU-30J	
WQEC	QUINCY IL	27				39-58-39	91-18-33.7		
WFYI	INDIANAPOLIS IN	20						OMNIDIRECTIONAL RCA TFU-36J, Pylon	
WKMJ	LOUISVILLE KY	68	1580					Non-directional	
WUCX	BAD AXE MI	35		151.5	386.5	43-41-25	82-56-27		
WUCM	UNIVERSITY CENTER MI	19		127	312.28	43-33-42	83-58-52		
KOZJ	JOPLIN MO	26	513	284	579				
KETC	ST. LOUIS MO	9			491.6				
WMAH	BILOXI MS	19						DIE TFU-30JDA Custom Skull	
WMAE	BOONEVILLE MS	12						Harris TAB-12H	
WMAO	GREENWOOD MS	23				33-22-34.2	90-32-31.5		
WMPN	JACKSON MS	29						DIE TFU-30J	
WMAB	MISSISSIPPI STATE MS	2		382				DIE TF-5CL	
WMAV	OXFORD MS	18						DIE TFU-36 JDA	
KUSM	BOZEMAN MT	9	3.39					SCALA TVO-8	
WUNF	ASHEVILLE NC	33						DIE TFU-25JSM	0, 150
WTVI	CHARLOTTE NC	42	2760	380	598				
WUNK	GREENVILLE NC	25						DIE TFU-30E	90, 270

Corrections to FCC Database-NTSC Parameters for Public Television Stations
November 22, 1996

Call	City-State	NTSC	ERP-kW	HAAT(m)	RCAMSL(m)	Latitude	Longitude	Directional Antenna Make and Model	Reference Angle
WUNM	JACKSONVILLE NC	19						AND 35 E7	120
WUNE	LINVILLE NC	17						AND ATW19HS5	105, 215
WUNJ	WILMINGTON NC	39						AND ATW 30 H4	285
WUNL	WINSTON-SALEM NC	26							125, 235
KBME	BISMARCK ND	3		418	995	46-35-23	100-48-02		
KXNE	NORFOLK NE	19		338	874				
KPNE	NORTH PLATTE NE	9				41-01-21	101-09-13		
KYNE	OMAHA NE	26	520						
WNJN	MONTCLAIR NJ	50	2094						
WMHT	SCHENECTADY NY	17			534.7716		74-00-05		
WMHQ	SCHENECTADY NY	45							46
WCET	CINCINNATI OH	48				39-07-27			
WOSU	COLUMBUS OH	34			615				
WLVT	ALLENTOWN PA	39	490						
WLJT	LEXINGTON TN	11		640	1110			RCA Traveling Wave	
WHTJ	CHARLOTTESVILLE VA	41				37-58-58	78-29-00		
KYVE	YAKIMA WA	47	550						
WHA	MADISON WI	21	1127					DIE TFU-29E	
New Facilities									
KUFM	MISSOULA MT	11	3	631	1909	46-48-09	113-58-21	ADC TR H2.3SD10C1	
WUNU	LUMBERTON NC	31	3.16	315	371	34-47-51	79-02-41	OMNI	

EXHIBIT 2

**DECLARATION AND STATEMENT OF FRED C. ESPLIN,
GENERAL MANAGER, KUED, SALT LAKE CITY, UT**

**Analysis of the Proposed FCC
DTV Channel Allotments and Spectrum Recovery Plan
and its Effects on KUED and KULC Translator Networks**

My name is Fred Esplin. I am Associate Director, Media Services, at the University of Utah, and General Manager of public television station KUED-TV, located in Salt Lake City, Utah. In this capacity I oversee the daily operations of KUED and public television station KULC, also in Salt Lake City. I have held the position of Associate Director, Media Services, since 1989. I have held the position of General Manager of KUED since 1981.

On August 14, 1996, the Federal Communications Commission released its Sixth Further Notice of Proposed Rule Making on the allotment and assignment of DTV channels. Included in this Notice is a proposed channel plan that pairs each existing full power NTSC licensee with a DTV channel. The FCC DTV table is based on the principles of full accommodation for all eligible broadcasters.

Included in the Sixth Further Notice of Proposed Rule Making, the FCC proposed for comment, the early recovery of television broadcast spectrum (spectrum recovery plan), of channels 60 to 69. The FCC spectrum recovery plan would make available television spectrum to be auctioned off for other telecommunication service. It has been proposed that some of the money earned from the spectrum recovery plan could be used to establish a trust fund for the funding of public television and radio, and to upgrade buildings and technical infrastructure in public schools.

KUED, licensed to the University of Utah, and KULC, licensed to the State Board of Regents, use television translators to extend classroom educational and other public television services from the Wasatch Front to rural and other hard-to-reach locations. Translators are low power service and given a secondary status by the FCC. Due to the scarcity of spectrum available in the broadcast band, the FCC did not attempt to provide translators with a paired DTV channel.

The FCC has estimated approximately 2200 existing translators and LPTV stations will have to change channels or go off the air in order to accommodate the new DTV services and the spectrum recovery plan. There are approximately 6600 translator and LPTV licensees in the FCC database.

In the state of Utah, KUED and KULC operate approximately 110 translators to extend their broadcast signals beyond the Wasatch Front to the rural communities. The rural communities support 20% of Utah's population living in 80% of the area of the state. KUED and KULC translators are daisy chained with as many as six hops or more. The majority of KUED's key translators, the beginning of a daisy chain, operate on channels between 55 to 69.

Based on the displacement numbers provided by the FCC, our analysis shows that the FCC has not taken into account in their estimates the multiple hop issue. By factoring in the hop issue, we believe the loss of translator stations could be four to five times higher. See Exhibits 1 and 2 for a comparison of KUED's existing coverage area, and the possible impact to this coverage area if the proposed Rule Making is approved. Television translators provide the rural residents of Utah with local and regional services,

such as news, sports, and in-school educational programming. Rural cable companies receive their local and regional programming from the translator stations for distribution to their subscribers. The KUED's translator network supports Utah's FCC required, statewide emergency alert plan (EAS) by distributing emergency information to the rural communities throughout the state.

We support the implementation of DTV, but in order to minimize the impact on existing television services to both urban and rural citizens, we believe it is in the best interest of the citizens of this country to delay the spectrum recovery plan of channels 60 to 69 until the transition to DTV is completed. At that time, we believe the FCC should be allowed to repack the spectrum and auction off what is not being used by full power television stations and translators.

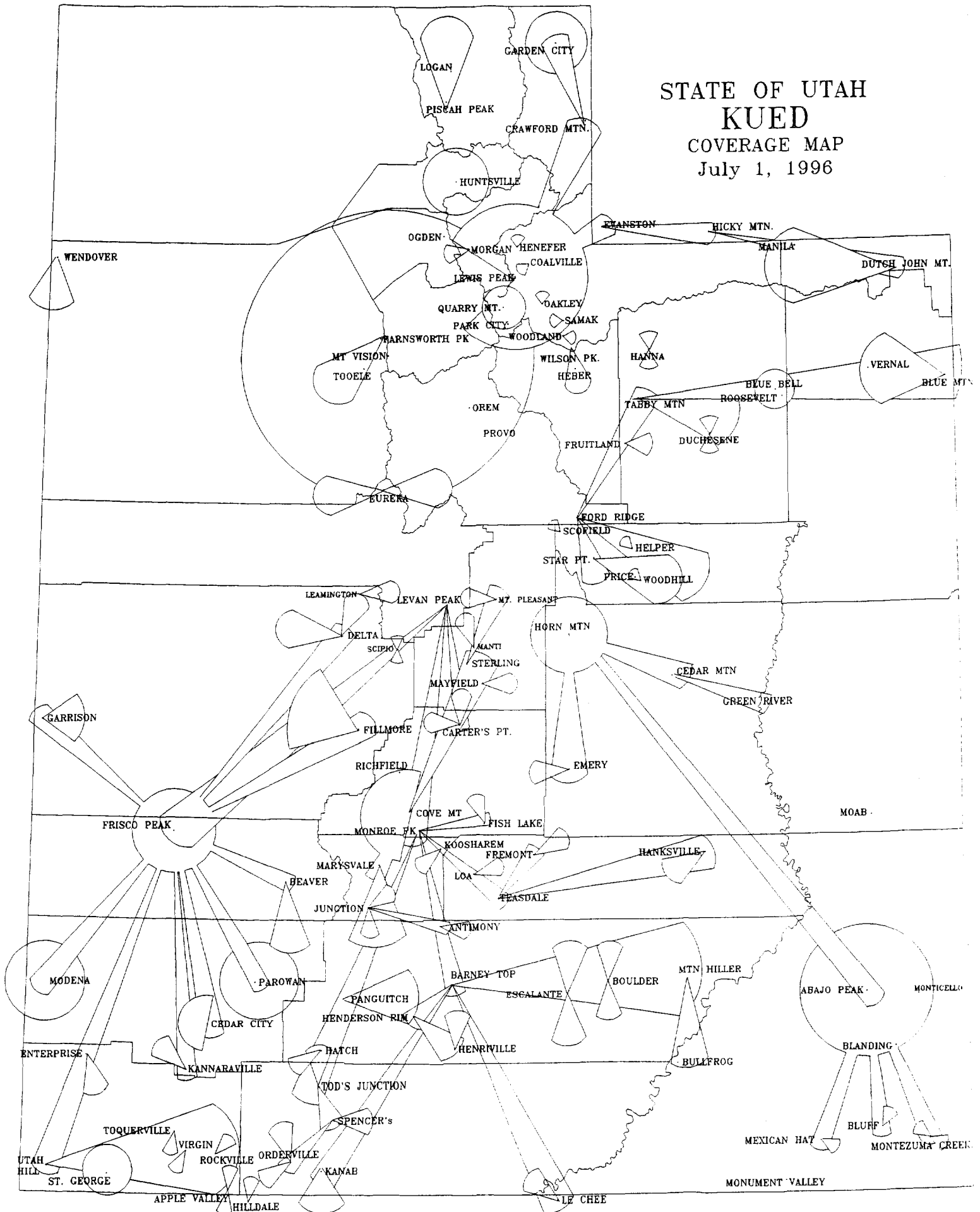
I declare under penalty of perjury that, except for the facts of which the Federal Communications Commission may take official notice, the facts set forth in the above statement are true and correct.

Executed on November 21, 1996

By: 

Fred C. Esplin
General Manager, KUED
Public Television
101 Wasatch Drive
Salt Lake City, UT 84112
(801) 581-7777

STATE OF UTAH
KUED
COVERAGE MAP
July 1, 1996



STATE OF UTAH
KUED
COVERAGE MAP
Without Channels 60 to 69

WENDOVER
LOGAN
GARDEN CITY
PISCATAH PEAK
CRAWFORD MTN.
HUNTSVILLE
OGDEN
MORGAN
HENEFER
COALVILLE
LEWIS PEAK
QUARRY MT.
PARK CITY
WOODLAND
HARNSWORTH PK
MT VISION
TOOELE
OREM
PROVO
EUREKA
HANNA
WILSON PK.
HEBER
TABBY MTN
ROOSEVELT
BLUE BELL
VERNAL
BLUE MTN.
DUTCH JOHN MT.
MANILA
HICKY MTN.
EVANSTON
FORD RIDGE
SCOTFIELD
STAR PT.
HELPER
PRICE
WOODHILL
LEAMINGTON
LEVAN PEAK
MT. PLEASANT
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MAYFIELD
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ROCKVILLE ORDERVILLE

• KANAB

APPLE VALLEY HILDALE

· LE CHEE

MONUMENT VALLEY

BLUFF.

MONTEZUMA CREEK

MONUMENT VALLEY